

Aging Division

Wyoming Department of Health

Information and Education Bulletin

Subject: Release Forms, Reasonable Costs and Prior Approval

AoA Title III and Title VII programs and services are not an entitlement. Services can be curtailed or eliminated due to lack of funding. The funding allocated for Title III and Title VII programs and services is a subsidy, meaning that the program or service has partial financial support from public funds. In order for clients to receive the subsidy, the client must complete the required documentation (e.g. AGNES, sign-in sheet, CAT, etc.) and must sign the Aging Needs Evaluation Summary Release Form. This is the form that gives you permission to release the client's information to the Aging Division, and the Aging Division is required to release it to the Administration on Aging when requested. If the client does not complete the required documentation and/or does not sign the release form, they cannot receive the subsidy. They shall be provided the service, but, as stated on the release form, they shall be asked to provide full payment for the service(s) or the service shall be paid for with local funds.

In order to maintain and properly manage funding and to provide proper stewardship over public funding, Aging Division grants cannot be charged for costs for services, goods or activities that are not authorized, allowable, reasonable, usual and customary. A charge is considered reasonable, usual and customary if it matches the general prevailing cost of that good, service or activity within your geographic area. For instance, you cannot charge an Aging Division grant a cost that exceeds what you would charge a private pay individual for that same service. A cost is reasonable if, in its nature or amount, it does not exceed that which would be "incurred by a prudent person under the circumstances prevailing at the time the decision was made to incur the costs". Additionally, for a cost to be considered to be reasonable, costs for goods, services and activities must be consistent with policies and procedures that apply uniformly to both federally-financed and other activities of the grantee organization. A grantee could never charge excessive costs for goods, services and activities to a government award.

Aging Division grants cannot be charged for unauthorized or unallowable services, e.g. carry out meals (there is no provision for carry out meals in the Older Americans Act). This question has come up several times. If a grantee chooses to provide a service not authorized through the Aging Division or Older Americans Act, they may do so within the dictates of the law, however the client shall pay for the full cost of the service or the service shall be paid for with local funds. If you have a question on allowable services, please contact the Aging Division.

Any cost charged to a grant must be incurred specifically for that grant and the activities and costs associated with that grant. Funding for a grant may never be shifted to another Federal award to overcome funding deficiencies, or to avoid restrictions imposed by law or by the terms of the award.

Any deviation from the grant application must have prior approval. Prior approval means securing the Aging Division's permission in advance to incur costs for those items that are designated as requiring such approval, for spending on costs not specified in your grant, and/or for exceeding costs specified in your grant. This permission must be obtained from the Aging Division in writing.

Rev: 06-30-2009